

Exhibit A

Bucci, Christina

From: Mary Werlwas
Sent: Tuesday, October 20, 2015 2:11 PM
To: 'Baek, Hanna'
Cc: Platt, Charles; Sussman, William I.; Conniff, Christopher P.; dgreenberger@ecbalaw.com; Jonathan Abady; JBoston@legal-aid.org; Jonathan Chasan; Bucci, Christina
Subject: RE: Nunez v City of New York

There does not appear to be any to point in further attempting to discuss why your letter is wholly unnecessary at this time, as you seem intent on filing it prior to the hearing and seeking to appear there as well. That said, I would like to point out that in all of our conversations on the matter, I have spoken on behalf of *all* class counsel with respect to your request. Our email yesterday was clear about that. Thus, the statement in your proposed letter that you did not "hear back" from Ropes & Gray or Emery Celli Brinckerhoff & Abady is misleading.

From: Baek, Hanna [mailto:Hanna.Baek@wilmerhale.com]
Sent: Tuesday, October 20, 2015 1:24 PM
To: Werlwas, Mary Lynne
Cc: Platt, Charles
Subject: RE: Nunez v City of New York

Mary Lynne: Thank you for speaking with me earlier today. We've conferred internally here, and think that filing the letter is necessary to preserve Mr. Wallace's position, and to make sure his issues do not get lost in the post-settlement activity. We have made some changes to the letter (attached here) that make clear we are not objecting to the settlement and that the issue can be resolved at the Court's convenience. We will file this afternoon.

Best,
Hanna

From: Werlwas, Mary Lynne [mailto:MLWerlwas@legal-aid.org]
Sent: Monday, October 19, 2015 8:55 PM
To: Baek, Hanna
Cc: william.sussman@ropesgray.com; christopher.conniff@ropesgray.com; Christina.Bucci@ropesgray.com; Chasan, Jonathan; jabady@ecbalaw.com; Boston, John; Debbie Greenberger; Platt, Charles
Subject: Re: Nunez v City of New York

Your email fails to credit the assurance that you will be given 14 days notice of any change, within which time you could take whatever appropriate steps you deemed advisable to pursue your position and we could respond as appropriate. We see no credible reason for you to trouble Judge Swain with this at this time.

On Oct 19, 2015, at 5:34 PM, Baek, Hanna <Hanna.Baek@wilmerhale.com> wrote:

Dear Ms. Werlwas: Thank you very much for your response. We appreciate your assurances that Nunez discovery materials will not be imminently destroyed. However, those assurances do not address our concern regarding eventual confidential access to some of those preserved materials. We feel that it is our responsibility as counsel to Mr. Wallace to at least raise this issue with the Court before the consent

judgement is finally approved, even if the Court decides to take up the issue after the fairness hearing. We plan to go ahead with filing the letter later tonight or tomorrow.

Best,
Hanna Baek

From: Werlwas, Mary Lynne [<mailto:MLWerlwas@legal-aid.org>]
Sent: Monday, October 19, 2015 4:16 PM
To: Baek, Hanna; 'william.sussman@ropesgray.com'; 'christopher.conniff@ropesgray.com'; 'Christina.Bucci@ropesgray.com'; Chasan, Jonathan; 'jabady@ecbalaw.com'; Boston, John; Chasan, Jonathan; 'Debbie Greenberger'
Cc: Platt, Charles
Subject: RE: Nunez v City of New York

Dear Ms. Baek:

We have reviewed your draft letter to Judge Swain. As you can well understand, we and our co-class counsel in Nunez are focusing our efforts on preparing for Wednesday's final approval hearing in that case. In order to assuage the near-term concerns you have expressed, on behalf of Nunez plaintiffs' class counsel we can assure you that none of our Nunez discovery materials or database will be destroyed imminently, and we will give you 14 days' notice before that changes. As you can also understand, this is without prejudice to any positions that we or our co-class counsel may take, after Wednesday's hearing, with respect to your requests (subject to the assurance just given).

We trust this does in fact assuage your stated near-term concerns.

From: Baek, Hanna [<mailto:Hanna.Baek@wilmerhale.com>]
Sent: Thursday, October 15, 2015 11:08 PM
To: 'william.sussman@ropesgray.com'; 'christopher.conniff@ropesgray.com'; 'Anna.Friedberg@ropesgray.com'; 'Christina.Bucci@ropesgray.com'; Chasan, Jonathan; Werlwas, Mary Lynne; 'jabady@ecbalaw.com'
Cc: Platt, Charles
Subject: RE: Nunez v City of New York

Counsel: Following up on our letter to you and our phone conversation with Ms. Werlwas last week, we would like to propose that we view the requested work product via a video meeting or in person. We understand that you have a concern over retaining control over work product, and this proposal aims to allow Mr. Wallace the benefit of accessing helpful work product from *Nunez* while also addressing this concern. We would like to resolve this informally, but if we cannot, we plan to file the attached letter in *Nunez* next week. We would of course be happy to discuss any other proposals you might have.

Best,
Hanna Baek

From: Baek, Hanna
Sent: Wednesday, September 30, 2015 9:08 PM
To: 'william.sussman@ropesgray.com'; 'christopher.conniff@ropesgray.com'; 'Anna.Friedberg@ropesgray.com'; 'Christina.Bucci@ropesgray.com'; 'jchasan@legal-aid.org'; 'mlwerlwas@legal-aid.org'; 'jabady@ecbalaw.com'
Cc: Platt, Charles
Subject: Nunez v City of New York

Counsel: Please see the attached letter from Charlie Platt and me regarding *Nunez v. City of New York*, No. 11-cv-5845 (S.D.N.Y.) (LTS) (JCF).

Best regards,

Hanna Baek | WilmerHale

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